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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SCOTT STERLING, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

IRIS ENERGY LIMITED, DANIEL
ROBERTS, WILLIAM ROBERTS,
BELINDA NUCIFORA, DAVID
BARTHOLOMEW, CHRISTOPHER
GUZOWSKI, and MICHAEL
ALFRED,

Defendants.

Case No. 2:22-cv-7273-JMV-MAH

Honorable John Michael Vazquez

Class Action

MOTION DAY: March 20, 2023

ORAL ARGUMENT REQUESTED

**Declaration of Albert Y. Chang in Support of the IREN Investor Group's
Motion for Appointment of Lead Plaintiff and for
Approval of Selection of Lead Counsel**

Under 28 U.S.C. § 1746, I, Albert Y. Chang, declare as follows:

1. I am an attorney with Bottini & Bottini, Inc., counsel for movants Network Racing Pty Ltd. (Robert Spano, Director), Nahi Beaini, LRJ Superannuation Fund (Marc De Stoop, Trustee), and De Stoop Investments Pty Ltd. (Joel De Stoop, Trustee) (together the “IREN Investor Group”). I submit this declaration in support of the IREN Investor Group’s motion for appointment of lead plaintiff and for approval of the selection of lead counsel. I have personal knowledge of the facts stated below; I could and would competently testify to these facts, if called upon to do so.

2. My colleagues and I have discussed this litigation extensively with the members of the IREN Investor Group, who have indicated that they are willing and able to serve as lead plaintiff as a group and, in the alternative, that they support the appointment of each of them individually as lead plaintiff. All group members are experienced investors. They have established a protocol to communicate with counsel and to manage this litigation.

3. Nahi Beaini, Marc De Stoop, and Joel De Stoop are business associates working together at Climatech, Australia's leading mechanical services contractor. Marc De Stoop and Joel De Stoop are brothers.

4. Attached as Exhibit 1 is a true and correct copy of a December 14, 2022 notice published on *PR Newswire* regarding the pendency of *Sterling v. Iris Energy Ltd.* Under the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. § 78u-4(a)(3)(A)(i), this notice sets February 13, 2023 as the deadline for motions for lead plaintiff appointment.

5. Attached as Exhibit 2 are the following true and correct copies of the certifications of proposed lead plaintiffs, as required by the PSLRA, 15 U.S.C. § 78u-4(a)(2)(A):

- the certification executed by Robert Spano on behalf of Network Racing Pty. Ltd. is attached as Exhibit 2A;
- the certification executed by Mr. Beaini is attached as Exhibit 2B;
- the certification executed by Marc De Stoop on behalf of LRJ Superannuation Fund is attached as Exhibit 2C; and

- the certification executed by Joel De Stoop on behalf of De

Stoop Investments Pty Ltd. is attached as Exhibit 2D.

6. Attached as Exhibit 3 is a true and correct copy of a loss chart identifying losses suffered by each member of the IREN Investor Group.

7. Attached as Exhibit 4 is a true and correct copy of Bottini & Bottini, Inc.'s firm resume.

8. Attached as Exhibit 5 is a true and correct copy of Cohn Lifland Pearlman Herrmann & Knopf LLP's firm resume.

9. Attached as Exhibit 6 is a true and correct copy of the Joint Declaration of the members of the IREN Investor Group.

I further declare under penalty of perjury that the foregoing is true and correct. Executed on February 13, 2023, at La Jolla, California.

s/ Albert Y. Chang

Albert Y. Chang